

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,
Plaintiff,

-vs-

ONE RED LANDROVER RANGEROVER, MODEL
HCT SUPERCHARGE, BEARING VIN. #SALMF
13486A216081,
Claimant.

CIVIL ACTION NO. 17-CV-10762

CHIEF JUDGE PATTI B. SARIS

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MOTION FOR ADJOURNMENT

COMES NOW CLAIMANT JEANINE M. JACKSON, proceeding pro se, and hereby moves this Honorable Court for an adjournment of the motion hearing set for Tuesday, September 19, 2017.

As reasons thereof, Claimant states the following:

1. Per the Court's order dated January 31, 2017, the government, on May 1, 2017, filed a Verified Complaint for Forfeiture In Rem, seeking the forfeiture of the vehicle.

2. On July 10, 2017, Claimant, proceeding pro se, filed a Motion to Dismiss the government's Verified Complaint for Forfeiture In Rem, for failure to state a claim upon which relief can be granted.

3. By her motion, Claimant argued that because the government failed to file its Verified Complaint for Forfeiture within 90 days of the filing of her timely, valid and verified claim on February

23, 2012 as required by §983(a)(3)(B), the government's Verified Complaint for Forfeiture is untimely and therefore fails to state a claim upon which relief can be granted and the government must release Claimant's property or in lieu thereof, its cash value when seized, \$32,625.00.

4. On August 18, 2017, the Court issued an electronic notice setting a hearing on Claimant's Motion to Dismiss for Failure to State a Claim for September 19, 2017.

5. However, because Claimant recently started a new assignment at her place of employment, she is unable to receive the 19th of September off to attend the hearing.

6. As a result thereof, Claimant request that the Court adjourn the motion hearing to November 13, 2017.

7. Additionally, Claimant, simultaneously with this motion, filed a motion for appointment of counsel to argue her Motion to Dismiss the government's Verified Complaint for Failure to State a Claim. Should the Court grant her motion for appointment of counsel, the additional time will permit counsel to get acquainted with the facts of the case and may possibly see if the matter may be resolved prior to the hearing.

WHEREFORE, Claimant respectfully request that this Honorable Court issue an order granting her motion to adjourn the motion hearing until November 13, 2017.

Respectfully submitted,
By Ms. Jeanine M. Jackson, Pro se

/s/: Ms. Jeanine M. Jackson
MS. JEANINE M. JACKSON
35 Lawton Street, Apt. #1
Fall River, MA 02721

Dated this 14th day
of September 2017.

Certificate of Service

I, Jeanine M. Jackson, hereby certify under the penalty of perjury, pursuant to 28 U.S.C. § 1746 that a true and correct copy of this motion was mailed first-class mail, postage prepaid to Doreen M. Rachal, United States Attorney's Office, Asset Forfeiture Unit, One Courthouse Way, Suite 9200, Boston, MA 02210 on this 14th day of September 2017.

/s/: Ms. Jeanine M. Jackson